I appreciate the opportunity to provide input to the Final Draft Version 1.0 specifications for Energy Star pre-rinse spray valves. I have reviewed both the Partner Commitments Final Draft and Final Draft Eligibility Criteria in depth. Ecotech is in the process of implementing the voluntary measures for additional recognition as outlined in your Partner Commitments Final Draft.

I think both the Eligibility Criteria and Partner Commitments Drafts are very well done and speak to most all the issues. The only input I have is on the comparative very liberal GPM use allowance of the valve @ 1.6 GPM. I am suggesting that serious consideration be given to a criteria as follows:

1. FLOW RATE @ 60 PSI MAXIMUM OF 1.0 GPM.
2. CLEANABILITY (same as stated) 26 SECONDS PER PLATE.

Ecotech has been conducting test on its pre-rinse valve and has been able to achieve 0.75 GPM @ 26 seconds per plate with pressure slightly under 60 PSI.

When you consider the typical high volume use of water @ 140 degrees or higher with pre-rinse spray valves the Energy saved between 1.6 GPM and 1.0 GPM is very significant even in a small kitchen operation. The water saved at the different flow rates is also very significant. Energy used for water pumping and water and sewage treatment is also very significant between the two flow rates especially when you combine a large number of pre-rinse spray valve operations.

THANKS
T.E. "Terry" JANSSEN, CEO